11/21/2003 NeuStar Input to the CPUC BHC workshop

Based on the FCC's report on local competition dated June 2003, there were over 10 million UNE-P lines as of December 2002, an increase of 4.4 million lines over December 2001. Assuming continued growth in UNE-P lines, there could be over 15 million UNE-P lines at the end of 2003, and assuming a finding of "no impairment" in most mass markets, a very significant percentage of these lines would have to be migrated in the next three years.

Thus, NeuStar believes that the process that state PUCs define for handling these hot-cuts needs to be scalable and as automated as possible to ensure that customers' service is not disrupted and so that CLECs and ILECs can perform these migrations with the lowest possible cost and the fewest possible errors.

The batch hot cut proceeding can be viewed as having two basic components:

- A business component, dealing with pricing, availability, and issues of "impairment."
- An operational component, dealing with the definition of how batch hot-cuts are accomplished where they are required.

This process, in turn, can be viewed as having two main components:

- The "lift-and-lay" process by which the customer's line is connected to the CLEC's switch instead of the ILEC's switch
- The inter-carrier processes by which
    - The hot cut is scheduled and coordinated; and by which
    - The ancillary transactions (such as updating call routing and E911) needed to ensure service are performed

NeuStar's expertise is in the latter of these two areas, and we believe that these processes can and should be cost-effectively automated. We suggest that the California PUC work closely with other PUCs in developing these processes, since they do not necessarily need to be different state-to-state. For the purpose of facilitating such cooperation, NeuStar has established an email exploder list for the Southwest Batch Hot Cut Collaboratives, batchhotcut@lists.neustar.biz. To be added to this list, please visit, http://lists.neustar.biz/mailman/listinfo.cgi/batchhotcut. NeuStar is willing to establish a separate list for the CA collaboratives to ease document distribution.

On the substance of the issues, we'd also like to take this opportunity to note that NeuStar, in addition to administering the NPAC, automates intercarrier processes associated with local service provisioning through it's Local service offerings. Given the likely volume of lines that need to be migrated from UNE-P to UNE-L, NeuStar believes that the process that state PUCs define for handling batch hot-cuts needs to be scalable and as automated as possible to ensure that customers' service is not disrupted and so that

CLECs and ILECs can perform these migrations with the lowest possible cost and the fewest possible errors.

In this context, Neustar would urge the PUCs to ensure that the batch hot-cut process includes automation not only of the CLEC-ILEC interaction relating to the scheduling and coordination of the hot cut, but also to all the ancillary transactions that need to be managed. One way to ensure that this process goes smoothly is through an industry-standard clearinghouse. Such a clearinghouse would:

- Manage the exchange of information amongst all the industry's trading partners using established and proven technology that includes process automation, fallout management, automated local service request gateways, adapters to third party service bureaus (such as E911, LIDB and CNAM databases) and the Number Portability Administration Center (NPAC).
- Allow CLECs and ILECs to interact with a single clearinghouse instead of each interacting with all the others.
- Provide CLECs, ILECs, and regulators with the information and reports necessary to manage batch hot cuts and ensure the process is working smoothly.

We also urge PUCs to define processes that:

- Mechanize all the key steps, and allow system-to-system interactions instead of human-human or human-system interactions between carriers.
- Include ancillary steps, such as E911, LIDB, CNAM, and directory listings updates in the process.
- Consider not just ILEC-CLEC migrations, but also CLEC-CLEC migrations.